

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

CITY OF ROCKFORD,

Plaintiff,

v.

MALLINCKRODT ARD INC., *et al.*,

Defendants.

Case No. 3:17-cv-50107

Hon. Iain D. Johnston

Hon. Lisa A. Jensen

**PLAINTIFF, THE CITY OF ROCKFORD'S, POSITION PAPER PURSUANT TO THIS
COURT'S MINUTE ENTRY ORDER [ECF 846] REGARDING THE MEDIA'S
REQUEST TO UNSEAL DOCUMENTS [ECF 845]**

In response to this Court's Minute Entry [ECF 846], the Plaintiff, the City of Rockford does not object to the unsealing of the requested document, as the deposition of Dr. Steve Miller, ESI's Chief Medical Officer who has spoken out publicly about Acthar's high price (Dkt. No. 98 at pars. 88, 94-103) will certainly influence, if not underpin, the Court's forthcoming decision on class certification. See *Baxter Int'l Inc. v. Abbott Labs.*, 297 F.3d 544, 545 (7th Cir. 2014).

Dated: July 13, 2023

Respectfully submitted,

s/ Donald E. Haviland, Jr.

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the City of Rockford, and the Classes*

CERTIFICATE OF SERVICE

I hereby certify that on July 13, 2023, a true and correct copy of the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Donald E. Haviland, Jr.

Donald E. Haviland, Jr.